UNITED STATES DISTRICT COURT NORTHERN DISTRICT OF ILLINOIS

FlavaWorks Entertainment, Inc.,)	
Blatino Media, Inc.,)	
Plaintiff,) Case No.: 1:24-cv-09725	
)	
v.		
) JURY TRIAL DEMANDE	Ĺ
John Doe 1, et al)	
Defendant	s.)	

PLAINTIFFS' MOTION FOR ALTERNATIVE SERVICE ON DEFENDANT JOSHUA COFIELD

Plaintiffs, by and through undersigned counsel, respectfully move this Court pursuant to Rule 4(e)(1) of the Federal Rules of Civil Procedure and applicable state law for leave to effectuate service of process upon Defendant Joshua Cofield by electronic mail and supplemental mailing. In support of this Motion, Plaintiffs state as follows:

- 1. Plaintiffs retained a professional process server and conducted a skip trace investigation to locate Defendant Joshua Cofield for the purpose of effecting service of process.
- 2. The investigation identified a residential address located at 13141 Riverside Drive, Apartment 307, Sherman Oaks, California 91423, which was believed to be Defendant's last known address.
- 3. Plaintiffs attempted service at that address on multiple occasions, but those attempts were unsuccessful.
- 4. According to information obtained from the property's leasing office and a current resident, Defendant Cofield no longer resides at the Sherman Oaks address and reportedly moved out in February 2025.

- 5. A Declaration of Due Diligence outlining the dates, times, and results of attempted service is attached to this Motion as Exhibit A.
- 6. Plaintiffs are aware that Defendant Joshua Cofield uses the email address royalazfuc@gmail.com, which has been verified and used in prior correspondence with Plaintiffs' CEO, Phillip Bleicher.
- 7. Defendant Cofield has responded to communications sent to that email address, demonstrating that the account is active, monitored, and used regularly.
- 8. Additionally, Plaintiffs obtained subscriber records from Google for the email address royalazfuc@gmail.com, which identify the account holder as "Royal Ace," born on November 29, 1987.
- 9. That birth date matches the known birthdate of Defendant Cofield, and the Google records also show a recovery phone number in the 909 area code.
- 10. The data obtained from Google further shows that the account has been accessed and used as recently as 2025, thereby confirming the account is active and likely to provide actual notice if used for service.
- 11. Rule 4(e)(1) of the Federal Rules of Civil Procedure permits service of process to be made by following the law of the state where the district court is located or where service is made.
- 12. Courts in this District and others have authorized alternative service by email where defendants have evaded traditional service methods and the email address is known to be valid. MacLean-Fogg Co. v. Ningbo Fastlink Equipment Co., Ltd., No. 08 C 2593, 2008 WL 5100414, at *2 (N.D. Ill. Dec. 1, 2008).
- 13. Plaintiffs respectfully request that the Court authorize alternative service of Defendant Joshua Cofield by the following methods:

Case: 1:24-cv-09725 Document #: 136 Filed: 09/17/25 Page 3 of 4 PageID #:387

a. By email to royalazfuc@gmail.com with the Alias Summons, Fourth Amended

Complaint, and all exhibits attached;

b. With delivery and read receipts enabled, and email tracking tools used to confirm

successful transmission;

c. And by certified U.S. Mail to the last known residential address: 13141 Riverside Drive,

Apt. 307, Sherman Oaks, California 91423, as a supplemental effort despite reports that

Defendant has moved.

14. Plaintiffs believe these methods are reasonably calculated to provide Defendant

Cofield with actual notice of this action and satisfy the requirements of due process.

15. For the foregoing reasons, Plaintiffs respectfully request that this Court grant leave to

effectuate service of process upon Defendant Joshua Cofield by email and supplemental mailing as

set forth above.

Dated: September 17, 2025

Respectfully submitted,

<u>/s/Hameed Odunewu</u> Attorney for Plaintiff

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Case: 1:24-cv-09725 Document #: 136 Filed: 09/17/25 Page 4 of 4 PageID #:388